

Noreen Rucinski

Dir. Strategic Business Development
Schneider Rucinski Enterprises
3344 N Mt. View Dr
San Diego CA 92116
619-282-7977
noreenr@cox.net
Plaintiff in Pro Per
Appearing *pro se*

FILED

08 MAR 24 AM 10:38

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

DEPUTY

UNITED STATES DISTRICT COURT

IN AND FOR THE SOUTHERN DISTRICT OF CALIFORNIA

SCHNEIDER RUCINSKI ENTERPRISES,)

Plaintiff,)

vs.)

TOUCH ASIA OUTSOURCING)
SOLUTIONS, INC., dba TOUCH ASIA)
CALL CENTER, INC.; RUDY NGAW;)
STRATASOFT, INC. PACIFIC CALL)
CENTERES; LANE MCCARTY)
individually and as an employee and/or)
agent of STRATASOFT, INC.; JASON)
PACE individually and as an employee)
and/or agent of STRATASOFT, INC.;)
MIKE BRIDGES individually and as an)
employee and/or agent of STRATASOFT,)
INC.; MICHEL BRIDGES, JR.,)
individually and as an employee and/or)
agent of STRATASOFT, INC.; INX, INC.,)
a Texas Corporation formerly known as I-)
SECTOR CORPORATION; COLO 6 LLC,)
a California Corporation, and NAVROZ)
HAJI, an individual, and DOES 1 through)
20, inclusive,)

Defendants.

Case No.: 08 CV 0138 WQH POR

Date: Monday April 28 - 2008
Time: 11 AM.

Judge: Hon. William Q Hayes

**PLAINTIFF'S MEMORANDUM IN
MOTION TO ENTER INTO DEFAULT**

Oral Argument Requested

PLAINTIFF'S REQUEST TO CLERK FOR ENTRY OF DEFAULT

The Plaintiff Schneider Rucinski Enterprises ("Plaintiff") pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, hereby requests the Clerk of this Court to enter a default against the Defendants, Stratasoft, Inc., on the grounds that the Defendants have failed to answer or otherwise respond to the Plaintiff's Complaint on file herein.

CR

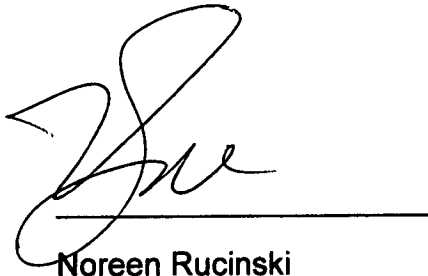
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The court files and records in this case and the affidavit of Ms. Ruciniski, agent for the Plaintiff attached hereto as Exhibit "A" reveal the following:

1. Plaintiff filed their original Petition with this court on January 26 2008.
2. Plaintiff served Defendants by certified process server on or about February 5th 2008, attached hereto as Exhibit "B" is plaintiff's certificate of service.
3. Defendant's agent, in an email, to Plaintiff's, acknowledges receipt of Complaint attached hereto as Exhibit "C".

Wherefore, premises considered, the Plaintiff hereby requests the Clerk of this Court for Entry of Default against the Defendant's Stratasoft, Inc. a Texas Corporation.

Respectfully submitted,



Noreen Rucinski
On behalf of Schneider Rucinski Enterprises

FROM : It Shall Be Done*Civil Process FAX NO. :18883444601

Mar. 05 2008 08:42PM

RETURN OF SERVICE

**UNITED STATES DISTRICT COURT
Southern District of California**

Case Number: 08 CV 0138 WQH POR

Plaintiff:

Schneider Rucinski Enterprises

vs.

Defendant:

Touch Asia Outsourcing Solutions, Inc. et al.

For:

Rucinski Noreen

Schneider Rucinski Enterprises

3344 N. Mt. View Dr.

San Diego, CA 92116

Received by IT SHALL BE DONE CIVIL PROCESS on the 30th day of January, 2008 at 11:37 am to be serve
Stratasoft, Inc., 6401 Southwest Freeway, Houston, TX 77074.

I, Larry White, do hereby affirm that on the 5th day of February, 2008 at 2:50 pm, I:

SUBSTITUTE served by delivering a true copy of the Summons in a Civil Action; Civil Cover Sheet;
Declaration of Noreen Rucinski; Notice of and Plaintiff's Application for Writ of Possession, Memo
of Points and Authorities; Verified Complaint with the date and hour of service endorsed thereon by me,
name Given as Unknown, a person employed therein and authorized to accept service for Stratasoft, Inc.
address of: 519 N. Sam Houston Parkway E., #650, Houston, TX 77060, the within named person's usua
of Work, in compliance with State Statutes.

Additional Information pertaining to this Service:

2/5/2008 2:40 pm I Larry White left a copy of the summons and complaint at the front desk at Stratasoft inc.
Gentlemen of India decent (no name given) From Stratasoft, Inc.

3/3/2008 1:50 pm I Larry White returned to Stratasoft, Inc. and to obtain a signature and left another a copy
summons and complaint with the recipient named Margie Esposito the office manager.

I certify that I am of sound mind and capable of making this Affidavit. I am an adult over the age of 18, have
interest in the above action nor a party to. I have never been convicted of any felony or of any crime of moral
turpitude and I am State Certified and Authorized to serve process under rule 103 and 536(a), to serve citation
other notices of the court.


Larry White
Process Server #SCH000001312

IT SHALL BE DONE CIVIL PROCESS
P.O. Box 10096
Houston, TX 77208-0096
(281) 586-9621

Our Job Serial Number: 2008000053

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document :
MOTION FOR DEFAULT JUDGEMENT

A copy was served as follows:

☒ **BY E-MAIL:** I sent a true copy via e-mail to all known parties of record who have provided e-mail addresses.

☒ **BY MAIL:** I sent a true copy via first-class mail to all known parties of record.

Executed in San Diego Ca , on the **24th** day of March .

Dated: March 24, 2008

SCHNEIDER RUCINSKI ENTERPRISES

By: 
Noreen Rucinski,
Dir. Strategic Business Development